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6 Attorneys for Defendant,  
7 N.A.R., INC. (erroneously sued as North American Recovery)

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 PAUL A. BOWLING,

11 Plaintiff,

12 vs.

13 EQUIFAX INFORMATION SERVICES, LLC, a  
Foreign Limited-Liability Company,  
14 TRANSUNION, LLC, a Foreign Limited-  
Liability Company, EXPERIAN  
15 INFORMATION SOLUTIONS, INC., a Foreign  
Corporation, NORTH AMERICAN  
16 RECOVERY, a Foreign Company,

17 Defendants.

Case No.: 2:18-cv-01209-RFB-PAL

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT  
AND ORDER**

18 NOW INTO COURT, through undersigned counsel, comes Plaintiff, PAUL A. BOWLING  
19 ("Plaintiff"), and Defendant, N.A.R., INC. (erroneously sued as North American Recovery)  
20 ("NAR"), who file this Joint Stipulation to Extend the Answer deadline to the Complaint filed by  
21 Plaintiff, and state:

- 22 1. On or about July 2, 2018, Plaintiff filed his Complaint in this Honorable Court.
- 23 2. Plaintiff contends that NAR was properly served. NAR recently learned of the case  
24 when it was given notice that a default would be sought. The Notice of Intent to Default was its first  
25 notice of the claim. NAR contends that a statutory agent for North American Recovery was  
26 erroneously served with the Complaint and the wrong entity has been named in the litigation.

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1           3.       Counsel for NAR immediately contacted Plaintiff's counsel upon learning of the  
2 litigation, intent to default and raised the legal issues regarding the incorrect entity being named and  
3 served.

4           4.       Plaintiff, through counsel, has agreed to allow NAR an extension, or until September  
5 21, 2018, to file Responsive Pleadings to Plaintiff's Complaint.

6           5.       NAR has not requested any prior extensions in this action.

7           6.       There are no pending hearings or matters currently before the Court.

8           7.       Despite due diligence and good faith efforts, NAR and its counsel require an  
9 extension of time to investigate the allegations in the Complaint, and prepare a responsive pleading.

10           WHEREFORE, Defendant, N.A.R., INC. (erroneously sued as North American Recovery),  
11 respectfully requests this Court grant an extension through and including September 21, 2018, to file  
12 its responsive pleadings to Plaintiff's Complaint.

13 DATED this 7<sup>th</sup> day of September, 2018.

DATED this 7<sup>th</sup> day of September, 2018.

14 **COGBURN LAW OFFICES**

**LINCOLN, GUSTAFSON & CERCOS, LLP**

15 /s/ Erik W. Fox



16 **JAMIE S. COGBURN, ESQ.**

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Attorneys for Defendant,

21 Henderson, NV 89074

N.A.R., INC. (erroneously sued as North

22 Attorneys for Plaintiff,

American Recovery)

23 Paul A. Bowling

24 **IT IS SO ORDERED.**

25 Dated: September 11, 2018

  
UNITED STATES MAGISTRATE JUDGE

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